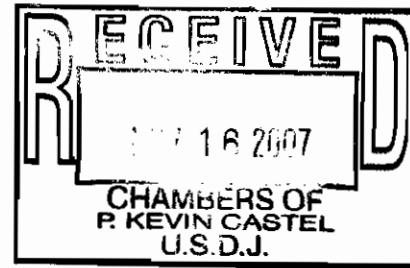


MEMO ENDORSED



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November 15, 2007

VIA HAND DELIVERY

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Honorable Judge P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: Granger v. Gill Abstract Corp. and Gill,
07 Civ. 3491 (PKC)(THK)**

**USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/19/07**

Dear Judge Castel:

As you know, this firm represents Defendants Gill Abstract Corp. and Gill in the above-referenced matter. On November 6, 2007, Plaintiff served Defendants with five new and separate motions: a motion to strike the affidavit of Nan Gill; a motion to strike the affidavit of Sal Cimaglia; a motion to strike the affidavit of Drew Diskin; a motion to strike Defendants' cross-motion for summary judgment; and a motion to strike "Docket Documents #20 through 26." We write to respectfully request that Your Honor strikes all these motions, because Plaintiff served the motions without first requesting a pre-motion conference in accordance with Your Honor's individual rules.

This is the second time that Plaintiff has failed to adhere to Your Honor's rules in connection with the filing of motions. On September, 20, 2007, Plaintiff served Defendants with a motion for summary judgment, again without first requesting a pre-motion conference. When Defendants objected to the motion on those grounds, Your Honor advised Plaintiff that his motion would stand on that one occasion only, in an order dated October 3, 2007. A copy of Your Honor's order is attached hereto as Exhibit "A" for the Court's convenience.

In addition to violating both the individual rules of this Court and Your Honor's October 3, 2007 order, Plaintiff's motions are procedurally and substantively improper. Plaintiff's motions ask this Court to strike various documents and affidavits submitted in conjunction with Defendants' cross-motion for summary judgment by challenging the legal and factual assertions contained therein- arguments that would all be more suitably made in Plaintiff's reply in support

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of his September 20, 2007 motion for summary judgment, and in opposition to Defendants' cross-motion. If Plaintiff had requested a pre-motion conference as per this Court's rules, and if one were to have been granted, Defendants would have had the opportunity to bring the deficiencies of Plaintiff's motions to Your Honor's attention.

Accordingly, Defendants respectfully request that Your Honor strike the five motions Plaintiff served upon Defendants on November 6, 2007.

Respectfully submitted,

COZEN O'CONNOR

APG

cc: John Granger, *pro se* (by First Class Mail)
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